

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

**STIPULATED MOTION AND
ORDER REGARDING SEALING
OF CLASS CERTIFICATION
BRIEFING**

**NOTE ON MOTION CALENDAR:
July 31, 2024**

DEBORAH FRAME-WILSON, *et al.*, on behalf
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

The Parties have met and conferred with respect to the upcoming briefing on class certification, and anticipate that their briefs, declarations, exhibits, and expert reports will quote from and/or describe in detail a significant amount of information that has been designated as Confidential or Highly Confidential-Attorneys' Eyes Only by either a Party or Non-Party. Accordingly, in order to ensure that such materials are treated appropriately under the applicable protective order, and to reduce burdens on the Court, the Parties, and Non-Parties, pursuant to LCR 7(d)(1) and 10(g), the Parties and their respective counsel hereby stipulate and agree to the following procedure for filing and sealing in connection with the class certification briefing, subject to the Court's approval.

1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its class certification briefs (including any opening, response, and reply briefs), expert declarations or reports, exhibits, and all other evidence and declarations on which that Party relies (collectively, "Class Certification Papers") which contain material designated Confidential or Highly Confidential-Attorneys' Eyes Only by any Party or Non-Party.

2. Within four weeks of the filing of Plaintiffs' reply brief, pursuant to LCR 5(g), the Parties, and any necessary Non-Parties, will meet and confer and, as appropriate, file (1) public versions of their Class Certification Papers, with necessary redactions, and (2) corresponding motion(s) to seal pursuant to LCR 5(g)(3). The schedule for filing any such public versions of the Parties' Class Certification Papers and corresponding motion(s) to seal shall be as follows:

	<i>DE COSTER</i>	<i>FRAME-WILSON</i>	<i>BROWN</i>
Reply in Support of Motion to Certify Class ¹	January 24, 2025	May 23, 2025	September 16, 2025
Filing of public versions of Class Certification Papers and corresponding Motions to Seal	February 21, 2025	June 20, 2025	October 14, 2025

¹ See *De Coster et al. v. Amazon.com, Inc.*, No. 2:21-cv-00693-JHC, ECF No. 160. STIP. MOT. & ORDER RE SEALING OF CLASS CERT. BRIEFING (No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC) - 2

3. The Party or Non-Party seeking to maintain material under seal (or under redaction) shall be the movant for purposes of any such motion(s) to seal associated with the Parties' class certification briefing.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED July 31, 2024.

Respectfully submitted,

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Attorneys for Defendant Amazon.com, Inc.

IT IS SO ORDERED.

Dated: July 31, 2024



John H. Chun
United States District Judge